

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HO TRAN,

Plaintiff,

v.

ARCTIC STORM MANAGEMENT GROUP, LLC;
ARCTIC FJORD, INC., *in personam*; and F/V
ARCTIC FJORD, her engines, tackle, gear and
Appurtenances, *in rem*,

Defendants.

At Law or In Admiralty

No. CV6 1275 RSM

DEFENDANTS' COUNTER
DESIGNATIONS OF DEPOSITION OF
ROMEO RAFANAN AND
DEFENDANTS' OBJECTIONS TO
PLAINTIFF'S DESIGNATIONS

Defendants designate the following portions of the deposition of Romeo Rafanan for
consideration by the Court at trial:

1. Deposition of Romeo Rafanan

Page 8, lines 1-8

Page 24, lines 6-7

Page 30, line 16

Page 31, lines 19-24

DEFENDANTS' COUNTER DESIGNATIONS OF DEPOSITION
OF ROMEO RAFANAN AND DEFENDANTS' OBJECTIONS TO
PLAINTIFF'S DESIGNATIONS – Page 1, CV6 1275 RSM

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1 Page 35, line 11 through Page 37, line 6
2 Page 37, lines 11-20
3 Page 38, line 4 through Page 39, line 6
4 Page 39, line 25 through Page 41, line 11
5 Page 41, line 25 through Page 43, line 7
6 Page 44, lines 5-8
7 Page 44, line 10 through Page 51, line 14
8 Page 52, lines 4-8
9 Page 52, line 20 through Page 54, line 7
10 Page 54, line 11 through Page 55, line 23
11 Page 58, line 22 through Page 59, line 17
12 Page 60, line 23 through Page 61, line 17
13 Page 63, line 1 through Page 67, line 24
14 Page 71, line 25 through Page 72, line 17
15 Page 73, line 21 through Page 74, line 1
16 Page 75, line 14 through Page 76, line 8
17 Page 77, lines 1-20
18 Page 79, line 14 through Page 81, line 5
19 Page 84 line 14 through Page 85, line 13
20 Page 87, line 3 through Page 88, line 2
21 Page 89, line 3 through Page 90, line 15
22 Page 91, lines 1-14
23 Page 99, line 25 through Page 100, line 1

Page 100, line 8

Page 101, lines 3-5

Defendants' objections to plaintiff's designations of the deposition of Romeo Rafanan:

Page 24, lines 3-11. Object to form of the question.

Page 27, lines 5-25. Objection. Relevance.

Page 32, line 9 through Page 33, line 13. Objection. Relevance, foundation.

Page 33, line 14 through Page 34, line 22. Objection. Relevance.

Page 81, line 6 through Page 84, line 13. Objection. Relevance.

Page 85, line 14 through Page 87, line 2. Objection. Relevance, responsiveness.

Page 98, line 8 through page 99, line 18. Objection. Relevance.

Page 100, Line 6 through Page 101, line 2. Objection. Relevance.

DATED this 21 day of November, 2007.

s/David C. Bratz *DB*

s/Carey M.E. Gephart

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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2007 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to The Honorable Ricardo S. Martinez, and all associated counsel of record.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

s/Janice Sweeney

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